

Remarks

Claims 1-14, 17-23, and 25-27 are now pending in this application. Applicants have amended claims 1, 5, 7-14, 17, and 22 and cancelled claims 15, 16, and 24 to clarify the claimed invention. Applicants respectfully request favorable reconsideration of this application.

Claim 15 is no longer pending. Accordingly, Applicants respectfully request withdrawal of the objection to claim 15.

Applicants have amended claim 27 to correct the typographical error noted by the Examiner. Accordingly, Applicants respectfully request withdrawal of the objection to claim 27.

The Examiner rejected claims 5, 7, 10-12 and 17-20 under 35 U.S.C. § 112, second paragraph. Applicants have amended these claims to ensure that antecedent basis exists for all terms and to clarify the claimed invention. Applicants submit that these claims comply with 35 U.S.C. § 112, second paragraph, and respectfully request withdrawal of this rejection.

The Examiner rejected claims 1-6, 8-15, 17-22, and 24-27 under 35 U.S.C. § 102(b) as being anticipated by U.S. patent 6,421,571 to Spriggs. The Examiner rejected claim 7 under 35 U.S.C. § 103(a) as being unpatentable over Spriggs et al. in view of U.S. patent 7,272,815 to Eldridge. The Examiner rejected claim 23 under 35 U.S.C. § 103(a) as being unpatentable over Spriggs et al. in view of U.S. patent 6,233,566 to Levine.

Spriggs does not disclose the invention recited in claims 1-6, 8-15, 17-22, and 24-27 since, among other things, Spriggs does not disclose automatically creating a link between the event or alarm and an action to be taken in the industrial safety system upon receipt of an event or alarm signal due to the event, generating a human machine interface comprising a representation of the related process or equipment and a representation of the event or alarm, and generating a control signal for the safety system to initiate the action to be taken in the industrial safety system. Spriggs appears to only display a list of alarms. Spriggs does not disclose linking an event or alarm with an action to be taken and automatically taking the action and automatically generating the human-machine interface. This is described in the specification at page 3=2, line 29, through page 3, line 4, and page 6, lines 27-34, which describe auto-generation of the human-machine interface and auto-generation of control code. This is quite different from simply listing alarms as discloses by Spriggs.

In view of the above, Spriggs does not disclose all elements of the invention recited in claims 1-6, 8-15, 17-22, and 24-27. Since Spriggs does not disclose all elements of the invention recited in claims 1-6, 8-15, 17-22, and 24-27, the invention recited in claims 1-6, 8-15, 17-22, and 24-27 is not properly rejected under 35 U.S.C. § 102(b). For an anticipation rejection under 35 U.S.C. § 102(b) no difference may exist between the claimed invention and the reference disclosure. *See Scripps Clinic and Research Foundation v. Genentech, Inc.*, 18 U.S.P.Q. 841 (C.A.F.C. 1984).

Along these lines, anticipation requires the disclosure, in a cited reference, of each and every recitation, as set forth in the claims. *See Hodosh v. Block Drug Co.*, 229 U.S.P.Q. 182 (Fed. Cir. 1986); *Titanium Metals Corp. v. Banner*, 227 U.S.P.Q. 773 (Fed. Cir. 1985); *Orthokinetics, Inc. v.*

Safety Travel Chairs, Inc., 1 U.S.P.Q.2d 1081 (Fed. Cir. 1986); and *Akzo N.V. v. U.S. International Trade Commissioner*, 1 U.S.P.Q.2d 1081 (Fed. Cir. 1986).

The combination of Spriggs and Eldridge does not suggest the invention recited in claim 7 since, among other things, the combination does not suggest automatically creating a link between the event or alarm and an action to be taken in the industrial safety system upon receipt of an event or alarm signal due to the event, generating a human machine interface comprising a representation of the related process or equipment and a representation of the event or alarm, and generating a control signal for the safety system to initiate the action to be taken in the industrial safety system. The Examiner cites Eldridge as suggesting a certain configuration of links among an event and an input, which does not suggest the elements recited in claim 1, from which claim 7 depends and which Spriggs does not suggest, as discussed above. Therefore, the combination of Spriggs and Eldridge does not suggest the invention recited in claim 7.

The combination of Spriggs and Levine does not suggest the invention recited in claim 23 since, among other things, the combination does not suggest automatically creating a link between the event or alarm and an action to be taken in the industrial safety system upon receipt of an event or alarm signal due to the event, generating a human machine interface comprising a representation of the related process or equipment and a representation of the event or alarm, and generating a control signal for the safety system to initiate the action to be taken in the industrial safety system. The Examiner cited Levine as suggesting a hand-held device displaying a graphical user interface, which does not suggest a system for controlling a process or equipment in an industrial safety system, the industrial safety system including components with inputs and

safety devices enabling signals to be generated as a result of an event or alarm and automatically create a link between a representation of a safety device and a representation of the even or alarm. Therefore, the combination of Spriggs and Eldridge does not suggest the invention recited in claim 23.

In view of the above, the references relied upon by the Examiner do not disclose or suggest patentable features of the claimed invention. Therefore, the references relied upon by the Examiner do not anticipate the claimed invention or make the claimed invention obvious. Consequently, the claimed invention is patentable over the cited references and Applicants respectfully request withdrawal of the rejections based on the cited references. Accordingly, Applicants request favorable reconsideration of this case and issuance of the notice of allowance.

If an interview would advance the prosecution of this application, Applicants respectfully urge the Examiner to contact the undersigned at the telephone number listed below.

The undersigned authorizes the Commissioner to charge fee insufficiency and credit overpayment associated with this communication to Deposit Account No. 22-0261.

Respectfully submitted,

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/Eric J. Franklin/
Eric J. Franklin, Reg. No. 37,134
Attorney for Applicants
Venable LLP
575 Seventh Street, NW
Washington, DC 20004
Telephone: 202-344-4936
Facsimile: 202-344-8300